

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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DR. MORGAN REYNOLDS on behalf of the
UNITED STATES OF AMERICA,

Plaintiff / Realtor,

vs.

Civil Action
No. 07 CV 4612

ECF CASE

SCIENCE APPLICATIONS INTERNATIONAL
CORP.; APPLIED RESEARCH ASSOCIATES, INC.;
BOEING; NuSTATS; COMPUTER
AIDED ENGINEERING ASSOCIATES, INC.;
DATASOURCE, INC.; GEOSTAATS, INC.;
GILSANZ MURRAY STEFICEK LLP;
HUGHES ASSOCIATES, INC.; AJMAL
ABBASI, EDUARDO KAUSEL;
DAVID PARKS; DAVID SHARP; DANIELE
VENEZANO; JOSEF VAN DYCK, KASPAR
WILLIAM; ROLF JENSEN & ASSOCIATES,
INC.; ROSENWASSER/GROSSMAN CONSULTING
ENGINEERS, P.C.; SIMPSON GUMPERTZ &
HEGER, INC.; S.K. GHOSH ASSOCIATES,
INC.; SKIDMORE, OWINGS & MERRILL,
LLP; TENG & ASSOCIATES, INC.;
UNDERWRITERS LABORATORIES, INC.;
WISS, JANNEY, ELSTNER ASSOCIATES,
INC.; AMERICAN AIRLINES; SILVERSTEIN
PROPERTIES; and UNITED AIRLINES,

Defendants.
----- X

**REQUEST FOR JUDICIAL
NOTICE PURSUANT TO
FED. R. EVID. 201**

Defendant Skidmore, Owings & Merrill, LLP ("SOM") respectfully requests that pursuant to FED. R. EVID. 201, this Court take judicial notice of the following fact that is not subject to reasonable dispute in any jurisdiction:

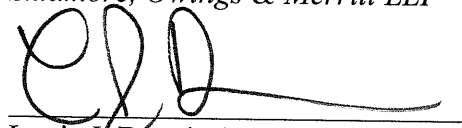
On September 11, 2001, terrorists hijacked commercial airplanes and flew them into the north and south towers of the World Trade Center, destroying both buildings.

This fact is also capable of accurate and ready determination pursuant to the findings of both the Supreme Court of the United States in *Hamdan v. Rumsfeld*,¹ 126 S. Ct. 2749, 2760, 165 L. Ed. 2d 723, 739 (2006) and the United States Court of Appeals for the Second Circuit in *SR Int'l Bus. Ins. Co. v. World Trade Ctr. Props., LLC*,² 467 F.3d 107, 116 (2d Cir. 2006).

Dated: New York, New York
February 4, 2008

Respectfully submitted,

ZETLIN & DE CHIARA, LLP
Attorneys for Defendant
Skidmore, Owings & Merrill LLP



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801 Second Avenue
New York, New York 10017
(212) 682-6800
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¹ The Supreme Court found that:

On September 11, 2001, agents of the al Qaeda terrorist organization hijacked commercial airplanes and attacked the World Trade Center in New York City and the national headquarters of the Department of Defense in Arlington, Virginia. Americans will never forget the devastation wrought by these acts. Nearly 3,000 civilians were killed.

126 S. Ct. at 2760, 165 L. Ed. 2d at 739.

² The Court of Appeals for the Second Circuit found that:

On the morning of September 11, 2001, terrorists flew two fuel-laden jetliners into the north and south towers of the WTC, destroying both buildings and cutting short the lives of thousands of people.

467 F.3d at 116.

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07 Civ. 4612

Year

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SCIENCE APPLICATIONS INTERNATIONALS CORP.; ET. AL.
Defendants.

REQUEST FOR JUDICIAL NOTICE PURSUANT TO FED. R. EVID. 201

ZETLIN & DE CHIARA LLP

Attorney(s) for Skidmore, Owings & Merrill, LLP

Office and Post Office Address

**801 SECOND AVENUE
NEW YORK, N.Y. 10017
(212) 682-6800**

Pursuant to 22 NYCRR 130-1.1, the undersigned, an attorney admitted to practice in the courts of New York State, certifies that upon information and belief and reasonable inquiry, the contentions contained in the annexed documents are not frivolous.

Dated: _____

Signature _____

Print Signer's Name _____

Service of a copy of the within

is hereby admitted.

Dated,

Attorney(s) for

.....

Sir: Please take notice

☐ **NOTICE OF ENTRY**

that the within is a (certified) true copy of a
duly entered in the office of the clerk of the within named court on

☐ **NOTICE OF ENTRY**

that an order
settlement to the HON.
judges

of which the within is a true copy will be presented for
one of the

of the within named Court, at
on the _____ day of _____
Dated,

at _____ M.

ZETLIN & DE CHIARA LLP

Attorney(s) for

Office and Post Office Address

**801 SECOND AVENUE
NEW YORK, N.Y. 10017**